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VIA EMAIL ONLY
Ketellapper.Linda@epa.gov

December 15, 2009

Linda Ketellapper, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105

Re: 104(e) Request for Information – Omega Superfund Site, Whittier, CA
Burke Street LLC – 12128 Burke Street, Santa Fe Springs, CA 90670

Dear Ms. Ketellapper:

On behalf of Burke Street LLC, and to the best of their knowledge, we submit the following additional information regarding the status of Burke Street LLC's environmental activities and obligations with respect to the above referenced property (the Site) in response to the U.S. Environmental Protection Agency's 104 (e) Request for Information dated February 24, 2009:

> Burke Street LLC has not engaged in the past and is not currently engaged in any environmental investigations, clean-up or other related activities at the Site since acquiring the Site in 1998/1999. At the time of acquisition, Burke Street LLC (through the developer, Catellus Development Corporation) received a "No Further Action" (NFA) letter from the Los Angeles Regional Water Quality Control Board dated August 6, 1999 (attached). The NFA was for a 10.53 acre "Central Property" of which the Site comprised a 5.32 acre parcel. The NFA cleared the soil at the Central Property due to extensive soil assessment and remediation that had been performed pre-acquisition. With respect to groundwater, the NFA noted there was a regional groundwater problem in the area of the Central Property, but that the Water Board did not require any further action with respect to groundwater contamination at that time. Until receipt of the USEPA's 104(e) Request for Information earlier this year, Burke Street LLC received no other communication from any governmental agency with respect to environmental conditions at the Site.

Burke Street LLC also has no past or current legal obligations in a court of law with respect to environmental conditions at the Site. Burke Street LLC has no agreements and/or orders between it and other parties, private or public, related to environmental conditions at the Site and ongoing activities or obligations. Since acquiring the Site, Burke Street LLC has leased the premises to a moving and storage company that handles and stores only high value products, office furniture and household goods.

Please let us know if you need any further information.

Best regards,

Maxy Rush Oruteye
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Enclosure

cc: Mr. Mark Stadler
Burke Street, LLC

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov/~rwqcb4

Gray Davis
Governor

August 6, 1999

Mr. James A. Adams
Catellus Development Corp.
201 Mission Street, 2nd Floor
San Francisco, CA 94105

CATELLUS DEVELOPMENT – CENTRAL PROPERTY - 12140 EAST SLAUSON AVENUE, SANTA FE SPRINGS (SLIC NO. 197A)

Dear Mr. Adams;

We have reviewed the following site assessment reports submitted for the above-mentioned site:

Petroleum Industry Consultants Tank Removal Report, dated 3/31/88.
Geosec Tank Excavation and Removal Report, dated 10/28/88.
Converse Environmental West Preliminary Report, dated 12/28/90.
Converse Environmental West Final Report, dated 8/29/91.
Dames & Moore Remedial Excavation Workplan, dated 1/10/92.
Dames & Moore Soil & Groundwater Investigation Workplan, dated 2/23/94.
Dames & Moore Site Characterization Activities Summary, dated 4/6/95.
Dames & Moore Subsurface Investigation Report, dated 9/6/96.

The Central Property (Site) consists of approximately 10.53 acres of land that were a part of the 40-acre Chrysler Nu-car Preparation facility. The historical uses for the Site include bulk storage from approximately 1928 to the mid-1940s, agricultural purposes from the 1940s to the early 1960s, and new car preparation operations from 1965 to 1988. In 1988, Chrysler discontinued operations and began site demolition activities. The Site has recently been developed into office and warehouse buildings.

Approximately ten building structures were formerly located on the Site. Car preparation operations formerly conducted at the site include body work, mechanical work, tune-up, front-end alignment, emissions control testing, painting, washing, detailing, and road performance tests. Seventeen hydraulic hoists, sixteen underground storage tanks (USTs), five clarifiers, and six service pits were formerly located on-site.

Chrysler ceased operations in 1988 and began site demolition activities. At that time, the hydraulic hoists, USTs, clarifiers, and service pits were removed from the site. Approximately 1,000 cubic yards of impacted soil were excavated and disposed off-site. With the exception of data from soil collected near clarifier CL-2, soil confirmation data collected from the excavations indicated that soil contamination had been removed from the site. Additional site assessment data indicated that significant concentrations of TPH and VOCs were detected in the vicinity of the former clarifier CL-2. The highest soil concentrations detected for TPH, TCE, PCE, and 1,1-DCE, were 13,000 µg/kg, 340 µg/kg, 3,800 µg/kg, and 1,200 µg/kg, respectively. Soil contamination was detected from the surface to 33 feet below ground surface (bgs).

In 1990, Converse Consultants excavated approximately 1,000 cubic yards of impacted soil from the former location of CL-2. An area measuring approximately 30 feet by 28 feet, was excavated to a depth of 33 feet bgs. Groundwater sampling data collected from on-site monitoring wells indicated that the highest PCE and 1,1-DCE concentrations were detected in GW-3, which is located downgradient of CL-2. The depth to groundwater was approximately 33 feet bgs.

In June and July 1996, Dames & Moore advanced 41 additional soil borings to determine if impacted soil was present in the former source areas. Soil sampling data indicated low concentrations of VOCs in the

soil. The highest PCE concentration detected was 23 µg/kg. Soil samples were collected at 5, 10, and 15 feet bgs, and analyzed for TPH and VOCs. The depth to groundwater was approximately 17 feet bgs. Since all sources of contamination have been remediated, **we require no further action for the soil at this Site.** Due to recent changes in legislation, the USTs will be addressed in a separate correspondence.

Groundwater data collected in 1996 indicated an upgradient groundwater contamination plume was migrating on-site. The most upgradient monitoring well GW-9, contained PCE and TCE concentrations at 1,600 µg/L and 310 µg/L, respectively. The highest PCE and TCE concentrations collected from GW-14 and GW-13, which are located in the immediate vicinity of CL-2, were 52 µg/L and 73 µg/L, respectively.

Previous groundwater data collected for the Site in 1991 and 1994, indicated that soil contamination detected at CL-2 had impacted the groundwater at this Site. The most recent groundwater data collected indicate that there is a regional groundwater problem in the area. We do not require any further action for the groundwater contamination at this time. The Water Board is currently evaluating groundwater conditions in the Santa Fe Springs area and may require additional groundwater assessment at this Site, at a future date.

If you have any questions, please contact Ms. Jenny M. Au at (213) 576-6734.

Sincerely,

Dennis A. Dickerson

James D. Kuykendall
Assistant Executive Officer

Cc: Ms. Debra Stott, Dames & Moore